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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

Tanana Chiefs Conference,)	
)	
Plaintiff,)	
)	
v.)	
)	
Matthew Greer,)	
)	
Defendant.)	
<hr/>		Case No. 4:21-cv-00014-HRH

COMPLAINT

INTRODUCTION

1. This action is brought by Plaintiff Tanana Chiefs Conference to stop Defendant Matthew Greer from trespassing on Native Alaskan land.

JURISDICTION AND VENUE

2. This court has jurisdiction over this action pursuant to 28 U.S.C. § 1331 (federal question); 28 U.S.C. § 1360(b)(civil jurisdiction in matters to which Indians are parties); 28 U.S.C. § 1353 (Indian allotments); 25 U.S.C. § 345 (actions for allotments); and Article III, § II of the U.S. Constitution.

3. The real property that is the subject of this matter is located at Little

Honolulu Creek near milepost 177 on the Parks Highway. It was transferred by Native Allotment Certificate Number 50-98-0435. It is more particularly described as follows:

Lots 1, 2, and 3, U.S. Survey No. 7492, Alaska. Containing 129.98 acres, as shown on the plat of survey officially filed on June 7, 1985. (Talkeetna Recording District)(3rd Judicial District).

The property is located within the boundaries of the District of Alaska. The events at issue also occurred within the boundaries of the District of Alaska. Venue in this court is proper pursuant to 28 U.S.C. § 1391(b)(2).

PARTIES

4. Plaintiff, Tanana Chiefs Conference (TCC), is a non-profit organization formed under the laws of State of Alaska with its principal place of business at 122 First Avenue, Ste. 600, Fairbanks, Alaska 99701. It is bringing this claim as *parens patriae*.

5. Defendant, Matthew Greer (Mr. Greer), is a resident of the State of Alaska.

FACTS

6. Trespass is a constant problem on Native property including the property at issue in this case.

7. Defendant has intentionally entered the property at issue in this case without consent or permission.

8. The peaceful tranquility of rural Native lands is especially important

because of the special significance of land in Native culture.

9. The value of the property is diminished by the trespass.

10. The peaceful tranquility is destroyed by repeated and continuing trespass.

11. Trespass on Native land harms not only the individual allotment owner but also all members of TCC and of the Native community.

12. TCC is a consortium of Native villages and tribes of which the allotment owners are members.

CLAIMS

13. All factual allegations are incorporated here.

14. Defendant has trespassed on the property and continues to trespass on the property in violation of law including 25 USC § 345, 25 CFR 162.106, AS 09.45, and Alaska common law.

REQUEST FOR RELIEF

15. An injunction prohibiting Mr. Greer from entering the property.

16. A declaration stating that nobody may enter the property without permission.

17. Monetary damages.

18. Costs, attorney fees, and interest.

19. All other equitable or legal relief this court considers fair.

DATED this 23rd day of June 2021.

KRAMER and ASSOCIATES
Tanana Chiefs Conference

By: /s/ Michael C. Kramer
ABA#: 9605031

CERTIFICATE OF SERVICE

I hereby certify that on June 23, 2021, a copy of the foregoing was served via certified mail to:

Matthew Greer
3324 Koba Way, Box 1
Fairbanks, AK 99709

/s/ Michael C. Kramer
Kramer and Associates